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## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ARIZONA

League of Women Voters of Arizona,

Plaintiff,

VS.

Lions of Liberty LLC; Yavapai County Preparedness Team; Jim Arroyo, Lucas Cilano; Nicholas Cilano; Brian Mounsey; Toby Fox; Bruce Mounsey; James Johnson; Melody Jennings; Clean Elections USA; John Does 1-10,

Defendants.

No. CV-22-08196-PCT-MTL

ORDER GRANTING PLAINTIFF'S MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION

Plaintiff League of Women Voters of Arizona ("Plaintiff" or "the League") moved to enjoin Defendants Melody Jennings, Clean Elections USA, and John Does 1-10 for violations of the Voting Rights Act and the Ku Klux Klan Act. Having considered the parties' pleadings, arguments of counsel, and the record in this case, the Court finds that Plaintiff have demonstrated all of the following: a strong likelihood of success on the merits; that, absent an injunction, they face immediate, irreparable injury from Defendants' actions; and that the balance of the equities and the public interest favor immediate preliminary injunctive relief.

Therefore, the Court hereby **GRANTS** Plaintiff's Motion for a Temporary Restraining Order and Preliminary Injunction and orders the following:

1. All Defendants, their officers, agents, servants, employees, and all persons in concert, privity, or participation with them must remove and take down any

statement that (falsely) conveys that an individual violates Arizona law anytime they deposit multiple ballots in a drop box, or Defendants shall be prosecuted for criminal contempt;

- 2. Defendants Jennings and Clean Elections USA shall communicate to their officers, agents, servants, employees, and all persons in concert, privity, or participation with them that Clean Elections USA has ceased the set of activities it refers to as "Dropbox Initiative 2022" and Defendant Jennings has ceased her role coordinating "Dropbox Initiative 2022," or these Defendants shall be prosecuted for criminal contempt.
- 3. Defendants, their officers, agents, servants, employees, and all persons in active concert, privity, or participation with them are **ENJOINED** from training, organizing, encouraging, or directing others to:
  - a. Follow, take photos of, or otherwise record individuals delivering ballots to a drop box;
  - b. Harass or verbally engage with individuals returning ballots to a drop box.
  - c. In connection with any specific claim that individuals committed voter fraud based solely on the fact that they deposited multiple ballots in a drop box, post online or otherwise disseminate images or recordings of, or personal information about, individuals who return ballots to a drop box, including but not limited to information about the individuals' identity, their distinguishing features, their license plate number, model and make of car, and/or similar information; or
  - d. Openly carry firearms and/or wear body armor within 250 feet of drop boxes.
- 4. Defendants, their officers, agents, servants, employees and all persons in active concert, privity, or participation with them are further **ENJOINED** from:
  - a. Following, taking photos of, or otherwise recording individuals returning ballots to a drop box.

- b. Harass or verbally engaging with individuals returning ballots to a drop box;
- c. In connection with any claim that individuals committed voter fraud based solely on the fact that they deposited multiple ballots in a drop box, posting online or otherwise disseminating images or recordings of, or personal information about, individuals who return ballots to a drop box, including but not limited to information about the individuals' identity, their distinguishing features, their license plate number, model and make of car, and similar information; or
- d. Openly carrying firearms and/or wearing body armor within 250 feet of drop boxes.
- 5. Defendant Jennings and Clean Elections USA shall post a copy of this injunction on its website, cleanelectionsusa.org, and include a prominently located hyperlink to this injunction on its homepage and a 1-sentence notice that an individual does not necessarily violate the law when they deposit multiple ballots in a dropbox.
- 6. Defendant Jennings shall post a hyperlink to the copy of this injunction hosted on cleanelectionsusa.org, along with images of the injunction's text, to her Truth Social page, @TrumperMel, daily from today until Wednesday, November 9 and a 1-sentence notice that an individual does not necessarily violate the law when they deposit multiple ballots in a drop box.
- 7. No person who has notice of this injunction shall fail to comply with it, nor shall any person subvert the injunction by sham, indirection, or other artifice.
- 8. Defendants shall promptly provide Plaintiff's counsel the list of volunteers and agents cooperating with Defendants so that Plaintiff's counsel can verify compliance with the injunction.
- 9. The bond requirement is hereby **WAIVED**.
- 10. This injunction will go into effect immediately and shall remain in effect pending further order from this Court.

## IT IS SO ORDERED.